

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

v.

CHINA NORTHEAST PETROLEUM HOLDINGS
LIMITED; WANG HONGJUN, (a/k/a Hongjun
Wang); JU GUIZHI (a/k/a Guizhi Ju); and JIANG
CHAO (a/k/a Chao Jiang)

Defendants,

JIANG MINGFU (a/k/a Mingfu Jiang); and SUN
JISHUANG (a/k/a Jishuang Sun),

Relief Defendants.

Case No. 12-CV-8696 (NRB)
ECF Case

**MOTION FOR LIMITED RELIEF FROM DISCOVERY
STAY AND FOR ISSUANCE OF SUMMONSES**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure and for the reasons set forth in the accompanying memorandum, Plaintiff, the United States Securities and Exchange Commission, respectfully moves the Court for an order (i) authorizing the Clerk of the Court to issue additional summonses to Defendant Ju Guizhi (a/k/a Guizhi Ju) and (ii) granting leave to serve upon Defendants limited discovery requests in aid of serving Ms. Ju.

Dated: July 28, 2014

Respectfully submitted,

/s/ Alfred A. Day

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 28, 2014, the foregoing document was filed through the Court's ECF system, and counsel has relied upon that system's service upon counsel of record.

/s/ Alfred A. Day